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9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION

13 UNITED STATES OF AMERICA,

14 Plaintiff,

15 v.

16 UNITED MICROELECTRONICS
17 CORPORATION, INC.; FUJIAN JINHUA
18 INTEGRATED CIRCUIT, CO., LTD.; CHEN
19 ZHENGKUN, a.k.a. STEPHEN CHEN; HE
20 JIANTING, a.k.a. J.T. HO; and WANG
YUNGMING, a.k.a. KENNY WANG.

21 Defendants.

UNDER SEAL

FILED

SEP 27 2018

SUSAN Y. SOONG
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

CR 18 465
CASE NO.

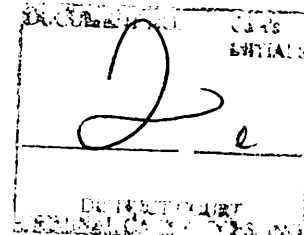
MOTION TO SEAL
AND [PROPOSED] ORDER

LHK

[UNDER SEAL]

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23 The United States hereby moves the Court for an order sealing this Motion, the Indictment, the
24 Summonses, and this Sealing Order until further order of the Court. Disclosure of the existence of the
25 Indictment and Summonses may cause the subjects of the Indictment to avoid service of process or
26 destroy evidence, jeopardizing the prosecution of the case.

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28 MOT. TO SEAL AND [PROP.] ORDER




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1 The United States requests leave to provide a copy of the Indictment and Summonses to agents
2 of the Federal Bureau of Investigations, other United States law enforcement, and employees of the
3 Department of Justice and other agencies of the United States government, in order to effectuate service
4 of process on the defendants and facilitate the prosecution of the charged case. United Microelectronics
5 Corporation, Inc. is a Taiwanese company and Fujian Jinhua Integrated Circuit, Co., Ltd. is a company
6 based in the People's Republic of China. The individual defendants, Chen Zhengkun (a.k.a. Stephen
7 Chen), He Jianting (a.k.a. J.T. Ho), and Wang Yungming (a.k.a. Kenny Wang) are Taiwan nationals
8 located in Taiwan or the People's Republic of China. The United States anticipates needing Taiwanese
9 and Chinese law enforcement support in effectuating service of the Indictment and Summonses on the
10 defendants. Accordingly, the United States requests leave to provide a copy of the Indictment and
11 Summonses to law enforcement agencies in Taiwan and the People's Republic of China.

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13 DATED: September 27, 2018

Respectfully Submitted,

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15 ALEX G. TSE
United States Attorney

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18 SHIAO C. LEE
Assistant United States Attorney

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28 MOT. TO SEAL AND [PROP.] ORDER

1 **ORDER**

2 Based upon the motion of the government and for good cause shown, IT IS HEREBY
3 ORDERED that the government's Motion to Seal, Indictment, Summonses, this Sealing Order, and other
4 related documents in this case shall be sealed until further order of the Court. A copy of the Indictment
5 and Summonses may be provided to agents of the Federal Bureau of Investigation, other law
6 enforcement, employees of the Department of Justice and other agencies of the United States
7 government, and law enforcement in Taiwan and the People's Republic of China, in order to effectuate
8 service of process on the defendants and facilitate the prosecution of the case.

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10 DATED: 9/27/18


THOMAS S. HLASON

United States Magistrate Judge

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MOT. TO SEAL AND [PROP.] ORDER